

October 30, 2003

Mr. Jack Broadbent  
Director of Air Management Division  
**United States Environmental Protection Agency**  
75 Hawthorne Street  
San Francisco, CA 94105

Re: **Shore Terminals– Facility #A7034**  
Minor Revision to Major Facility Review Permit

Dear Mr. Broadbent:

**ALAMEDA COUNTY**

Roberta Cooper  
Scott Haggerty  
(Chairperson)  
Nate Miley  
Shelia Young

**CONTRA COSTA COUNTY**

Mark DeSaulnier  
Mark Ross  
Gayle Uilkema  
(Secretary)

**MARIN COUNTY**

Harold C. Brown, Jr.

**NAPA COUNTY**

Brad Wagenknecht

**SAN FRANCISCO COUNTY**

Willie Brown, Jr.  
Chris Daly  
Jake McGoldrick

**SAN MATEO COUNTY**

Jerry Hill  
Marland Townsend  
(Vice-Chairperson)

**SANTA CLARA COUNTY**

Liz Kniss  
Patrick Kwok  
Julia Miller  
Dena Mossar

**SOLANO COUNTY**

John F. Silva

**SONOMA COUNTY**

Tim Smith  
Pamela Torliatt

William C. Norton  
**EXECUTIVE OFFICER/APCO**

This is to advise you that the Bay Area Air Quality Management District is issuing a minor revision to the Major Facility Review Permit for Shore Terminals. (Facility Number A7034).

The purpose of this minor revision is to add two existing diesel emergency generators that lost their exemptions pursuant to the revision of Regulation 2, Rule 1, General Requirements, dated 5/17/00, and three new gasoline internal floating roof tanks with 4.2 million gallons capacity each. These revisions were reviewed under District Applications #4684 and #5850, respectively. To add these sources, the following sections were revised:

- Section II, Table IIA - Permitted Sources: added sources S74 to S78.
- Section IV, Source Specific Applicable Requirements: added Tables IV-J and Table IV-K for sources S74 to S78.
- Section VI, Permit Conditions: Schedule A of Condition #1253 was revised to change the total POC emissions for the whole facility from 65.1 to 67.146 tons per calendar year.
- Section VI, Permit Conditions: Condition #19308 added for S-74 and S-75, Emergency Diesel Generators
- Section VI, Permit Conditions: Condition #20060 added for S-76, S-77 and S-78, Internal Floating Roof Tanks
- Section VII, Applicable Limits and Compliance Monitoring Requirements: Tables VII-J and Table VII-K were added for sources S74 to S78.
- Table VII, Test Methods: The sulfur fuel test method and the particulate visible test method were added.

The following corrections and changes were also made:

- The standard portions of the permit have been updated.
- The dates of various BAAQMD and SIP rules have been updated or corrected.
- Various corrections of grammar and permit format were made.
- The bases for some conditions cited in Section IV, Source-Specific Applicable Requirements, were corrected to reflect the correct bases in Section VI, Permit Conditions.
- Tables IV-A, B, C, D, and H, and Tables VII-A, B, C, D, and H were corrected to reflect the 11/27/02 amendments to Regulation 8-5, Storage of Organic Liquids.
- Table IV-L and Tables VII-L were added to include the facility's specific

- applicable requirements and applicable limits and compliance monitoring.
- Condition #9005 was deleted because sources in the condition were never built and the Authority to Construct was canceled.
  - Condition #1253, part IIB was added to require abatement of all fixed roof tanks, truck rack and marine loading by A-1, thermal oxidizer.
  - Abatement devices A-41 and A-2 were removed from the list of Table IIB because they were no longer in service.
  - The capacity and fuel usage of thermal oxidizer were added to Table IIB.
  - NOx and SOx emissions from vapor control equipment combustion and direct fire heater combustion were included in the total limit listed in Condition #1253, part IIID, Schedule B and C.
  - Facility-wide recordkeeping was moved from the source-specific tables in Section IV and VII to new "Facility" tables.

The permit was submitted for EPA review on May 29, 2003. EPA submitted no comments on the minor revision.

In addition to this revision, the following corrections and changes were also made after the permit was submitted for EPA review on May 29, 2003:

- Addition of the pressure-vacuum valve requirement (Regulation 8-5-605) in Tables IV-A, B, C, and H, and Regulation 8-5-303.1 and 303.2 in Tables VII-A, B, C, and H for fixed roof tanks
- Deletion the SIP requirements of Regulation 8-5 in Tables IV-A, B, C, D, H, K, M and Tables VII-A, B, C, D, H, K, M because the current rule was adopted into the SIP on June 5, 2003.
- Addition of Regulation 8, Rule 47, Air Stripping And Soil Vapor Extraction Operations, to Section III, Generally Applicable Requirements.

A copy of the final Major Facility Review Permit is enclosed for your information. If you have any questions on this matter, please call **Steve Hill, Air Quality Engineering Manager, at (415) 749-4673.**

Very truly yours,

William C. Norton  
Executive Officer/  
Air Pollution Control Officer

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Enclosures

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